

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO, et
al.,

Defendants.

No. 12-cv-2039 (GAG)

**MOTION SUBMITTING JOINT RESPONSE TO THE SIX-MONTH REPORT OF THE
TECHNICAL COMPLIANCE ADVISOR IN UNRESTRICTED MODE**

COMES NOW, Plaintiff, United States of America, through the undersigned, and respectfully submits the Parties' "Joint Response to the Six-Month Report of the Technical Compliance Advisor, December 7, 2014 – June 7, 2015," Dkt. #252 (Joint Response), in unrestricted mode for the public record. For cause, the United States alleges and states as follows:

1. Paragraph 250 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department (Agreement) requires that the Technical Compliance Advisor (TCA) file written public reports on the Commonwealth's implementation of the Agreement every six months. Agreement, ¶ 250, Dkt. #57-1. On July 10, 2015, the TCA filed his second "Six-Month Report of the Technical Compliance Advisor, December 7, 2014 – June 7, 2015," Dkt. #245 (Second Six-Month Report), after receiving extensive comments from the Parties.

2. Paragraph 252 of the Agreement permits the Parties to respond to the TCA's final report within 30 days. On August 14, 2015, the Court instructed the Parties to submit their comments or objections to the TCA by August 17, 2015, following a request by the Parties for a brief extension. Order of 8/14/15, Dkt. #251. The Court also instructed the Parties to file their

objections or comments in restricted mode, adding that the same “will be made public once the Court so decides.” *Id.* The Parties complied with the Court’s Order and timely filed the Joint Response in restricted mode. Dkt. #252.

3. At the October 23, 2015, public hearing, the Parties requested leave from the Court to file the Joint Response in unrestricted mode for the public record. The Court granted the Parties’ request from the bench.

4. The Parties have reviewed the Joint Response and the accompanying attachments to redact language that is law enforcement sensitive or that contains personally-identifying information.

WHEREFORE, the United States respectfully submits the Joint Response in unrestricted mode for the public record.

Respectfully submitted, this 29th day of October, 2015,

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Deputy Assistant Attorney General
Civil Rights Division

JUDITH PRESTON
Acting Chief

CHRISTY LOPEZ
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s/Luis E. Saucedo
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on this 29th day of October 2015, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

s/Luis E. Saucedo
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